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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the Transport of Dangerous Goods
(Fourteenth session,
Geneva, 8-18 December 1997,
agenda item 2 (d))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Other draft amendments

Proposal to amend Chapter 3.4

Transmitted by the European Confederation of Paint, Printing Ink and Artists' Colours Manufacturers' Association (CEPE)

Introduction

At the thirteenth session of the Sub-Committee, CEPE proposal ST/SG/AC.10/C.3/1997/5 was considered and CEPE was invited to submit further justification for its proposal.

It is not possible for industry to comply with a wide and varied set of legislative and commercial requirements for information provision on small packagings of dangerous goods that are not subject to the limited quantity provisions of Chapter 3.4. A major problem is the requirement for transport labelling and IMDG Code marine pollutant marking. The dilemma faced by industry is very succinctly summed up by the English saying "You cannot get a quart (1.136 Litres) into a pint (0.568 Litres) pot". CEPE proposes to resolve this problem through the use of the existing Limited Quantity provisions of Chapter 3.4, and in particular 3.4.6.

Chapter 3.4 provisions serve a number of purposes, some of which are unintentional:

- It permits the legal transport of goods where packagings conforming to the requirements of Chapter 6.1 are either not available or are not commercially acceptable to the consumer.
- It permits the legal transport of goods in those parts of the world where packagings conforming to the requirements of Chapter 6.1 are not readily available.
- Supply labelling can be applied to the inner receptacle and transport labelling to the outer packaging where space is limited on small packagings. (See Annex 1 (A) DPD Article 8 (5)).

Regulatory and commercial information that has to be provided on small packagings includes:

- Health and Safety for Supply regulatory information (See Annex 1 (A))
- Transport regulatory information (See Annex 1 (B))
- Packaging content legislation
- Instructions for use
- Commercial information
- EPOS (Electronic Point Of Sale) bar-coding for retail products

(Annex 1 of this proposal contains the text from relevant European Union Directives purely as an example of the types of legislation that industry has to comply with.)

If industry wishes to use packagings conforming to Chapter 6.1, the full requirements of the applicable regulations have to be complied with, particularly the requirement for transport hazard labelling and marine pollutant marking (See Annex 1 B), together with the wider requirement for information provision. The derogations in Section 3.4.6 of the model regulations are only available if, as for example in the IMDG Code, these packagings are transported as inner receptacles placed in suitable outer packagings, or in shrink-wrapped or stretch-wrapped trays. Packagings conforming to Chapter 6.1 are performance tested and such requirements are anomalous.

Industry is under pressure to make more efficient use of resources, and to reduce the unnecessary use of secondary or tertiary packaging (See Annex 1 A (2)). In some parts of the world, small packagings conforming to Chapter 6.1 are now becoming available and are viable economic alternatives to the use of Limited Quantity provisions as currently contained in Chapter 3.4. However their use is precluded due to the legislative and commercial requirements for the information that has to be provided on the packaging.

Annex 2 contains an illustrated example of the solution of the problem by this proposal based on the proverbial pint pot (500 ml lever lid tin). The example used is a tin of decorative (retail) gloss paint based on white spirit, which would be a marine pollutant under the IMDG Code. Such a tin would have gross external dimensions of 89mm diameter by 100mm height, which would give an area on the tin of 270mm by 93 mm for information provision. The top example is based on existing legislative requirements which leaves no space for the commercial information on the packaging, and this could normally be expected to account for about 50% ±10% of the available area. The bottom example is based on the application of this proposal.

Proposal to amend Section 3.4.2

Replace the existing text of 3.4.2 with the following:

3.4.2 Dangerous Goods shall be packed in either:

3.4.2.1 Inner packagings placed in suitable outer packagings. However the use of inner packagings is not necessary for the transport of articles such as aerosols or "receptacles, small, containing gas". The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 and be so designed that they meet the construction requirements of 6.1.4. The total gross mass of the package shall not exceed 30 kg; or

3.4.2.2 Packagings conforming to the provisions of Chapter 6.1 and of a design type successfully tested in accordance with the requirements laid down in 6.1.5.

Justification

This proposal seeks to permit industry to comply with a wide variety of legislation and to make the most efficient use of the space available on small packagings for the provision of commercial and legislative information.

* * * * *

Annex 1

A

(1) Council Directive 88/379/EEC on the approximation of the laws, regulations and administrative provisions of the Member States relating to the classification, packaging and labelling of dangerous preparations (DPD)

Article 7

1. The following information shall be clearly and indelibly marked on the package:

- The trade name or designation of the preparation;
- The name and full address including the telephone number of the .....
- The symbols, where specified .....
- Standard phrases indicating any special risks arising from such dangers (R phrases)
- One or more standard phrases indicating the safety advice ..... (S phrases)
- The nominal quantity (nominal mass or nominal volume) of the contents in the case of preparations sold to the general public

Article 8

1. .....The dimensions of the label shall be as follows: (provision of Health & Safety information)

Capacity of the package not exceeding 3 Litres at least 52 x 74 millimetres

5. For the purpose of this Directive, labelling requirements shall be deemed to be satisfied:

(a) In the case of an outer package containing one or more inner packages, if the outer package is labelled in accordance with international rules on the transport of dangerous preparations and the inner package or packages are labelled in accordance with this Directive.

(2) European Parliament and Council Directive 94/62/EC on packaging and packaging waste

Introductory text:-

"Whereas the best means of preventing the creation of packaging waste is to reduce the overall volume of packaging;"

Article 3

1. 'Packagings' consist only of :

(a) sales packaging or primary packaging, i.e. packaging conceived so as to constitute a sales unit to the final user or consumer at the point of purchase;

(b) grouped packaging or secondary packaging, i.e. packaging conceived so as to constitute at the point of purchase a grouping of a certain number of sales units .....;

(c) transport packaging or tertiary packaging, i.e. packaging conceived so as to facilitate handling and transport .....

4 'prevention' shall mean the reduction of the quantity and of the harmfulness for the environment of

- materials and substances contained in packaging and packaging waste,
- packaging and packaging waste at production process level and at the marketing, distribution, utilization and elimination stages.

B

(1) United Nations Model Regulations on the Transport of Dangerous Goods

5.2.1.1 Unless provided otherwise in these regulations, the proper shipping name for the dangerous goods as determined in accordance with 3.1.2 and the corresponding UN Number preceded by the letters "UN" shall be displayed on each package. .....

5.2.2.1.2 Where articles or substances are specifically listed in the Dangerous Goods List, a danger class label shall be affixed for the hazard shown in column 3 of the List ..... unless qualified by a special provision.

5.2.2.2.1.1 Labels shall be in the form of a square set at an angle of 45 ° (diamond-shaped) with minimum dimensions of 100 mm by 100 mm, except in the case of packages of such dimensions that they can only bear smaller labels .....;

(NOTE: No indication is given as to the minimum size of label required for small packagings, but one authority interpreted this as being as large as could possibly be fitted on to the packaging.)

3.4.6 Packages of dangerous goods transported according to this Chapter need not be labelled. (Dangerous Goods packed in Limited Quantities)

(2) IMDG Code _ General Introduction, sections 18 and 23, re Marine Pollutants

23.5.5 The marine pollutant marking requirements of sections 7 and 8 of this general introduction should not apply to:

.1 packages containing marine pollutants **in inner** packagings with contents of :

- 5 litres or less for liquids; or
- 5 kg or less for solids and

.2 packages containing severe marine pollutants **in inner** packagings with contents of :

- 0.5 litres or less for liquids; or
- 500 grams or less for solids.

18.7.1 Packages of dangerous goods transported in accordance with the special requirements of this section: (Dangerous Goods packed in Limited Quantities)

.1 need not be labelled or bear the marine pollutant mark;

UN1263
PAINT

Anypaintco Gloss Paint

For use on: Wood or metal
Coverage: 500 ml covers up to 5m²
Drying Times: Touch dry in 4 hours*
Overcoating Time: Overcoatable in 16 hours*
Brush cleaner: White spirit
* Under normal conditions

SURFACE PREPARATION:
Ensure that all surfaces are in good condition, clean, dry and free from grease and other contaminants.
BARE WOOD: Sand smooth and wipe clean. Apply one coat of wood primer and 1-2 coats of undercoat before application of the finish.
BARE METAL: Ensure the surface is free from surface rust. Apply one coat of metal primer and 1-2 coats of undercoat before application of the finish.
PREVIOUSLY PAINTED SURFACES: Remove any flaking or blistered paintwork and prime and undercoat any exposed substrate. Special precautions should be taken during surface preparation of pre 1960's paint surfaces as they may contain harmful lead.

APPLICATION:
Read Health and Safety information before use.
Stir well before use.
Sand the undercoat smooth with 320-400 grade wet or dry paper.
Apply 1-2 coats in dry well-ventilated conditions.
When applying by roller, smooth off with a pad or brush.
Avoid applying late in the evening as condensation can cause a loss of gloss.

Health and Safety Information

Anypaintco Gloss Paint
Flammable
Keep out of reach of children
Do not breathe vapour/spray
If swallowed seek medical advice immediately and show this container or label
Use only in well ventilated areas

Anypaintco
Any Street
Anytown
Any Region
Any Country
Telephone 0123 456789

500 ml e

5 021905 290964

BRAND
COMMERCIAL
CORPORATE
INFORMATION

Anypaintco Gloss Paint

For use on: Wood or metal
Coverage: 500 ml covers up to 5m²
Drying Times: Touch dry in 4 hours*
Overcoating Time: Overcoatable in 16 hours*
Brush cleaner: White spirit
* Under normal conditions

SURFACE PREPARATION:
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APPLICATION:
Read Health and Safety information before use.
Stir well before use.
Sand the undercoat smooth with 320-400 grade wet or dry paper.
Apply 1-2 coats in dry well-ventilated conditions.
When applying by roller, smooth off with a pad or brush.
Avoid applying late in the evening as condensation can cause a loss of gloss.

UN1263 PAINT

Health and Safety Information

Anypaintco Gloss Paint
Flammable
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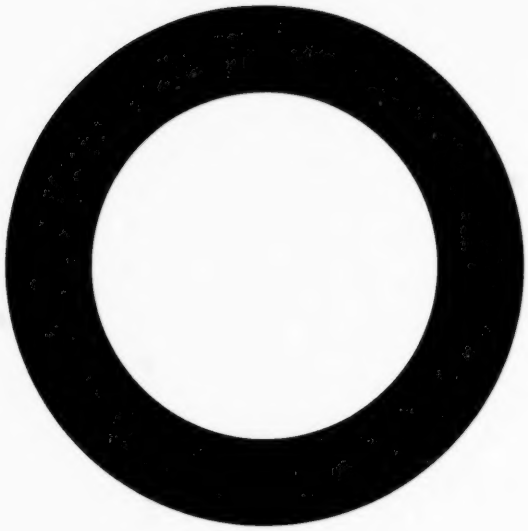
If swallowed seek medical advice immediately and show this container or label
Use only in well ventilated areas

Anypaintco
Any Street
Anytown
Any Region
Any Country
Telephone 0123 456789

500 ml e

5 021905 290964

Annex 2



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DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Other draft amendments

Proposal to amend Chapter 5.4 Documentation

Transmitted by the European Confederation of Paint, Printing Ink and Artists' Colours Manufacturers' Association (CEPE).

Objectives

- To harmonise Dangerous Goods Transport Documentation requirements in all modes
- To reduce the number of different forms to be completed by consignors
- To establish the legal use of EDI and related communication technologies
- To improve the standard of completion of Dangerous Goods Transport Documentation

Introduction

Background

The UK Competent Authority responsible for compliance with the IMDG Code, in its report of 1996 Dangerous Goods Cargo Unit Inspections, found deficiencies in transport documentation in 51.7% of all units inspected. Other competent authorities carry out similar inspections.

Agenda 21 Chapter 19

One of the aims of Agenda 21 Chapter 19 of the UNCED is the global harmonisation of hazard communication. The tenth revised edition of the United Nations Recommendations on the Transport of Dangerous Goods (UNRTDG) recognises the Transport Document as a means of information communication, including hazard information, and in the Annex to these Chapter 5.4 deals with documentation. The adoption of a globally harmonised Multimodal Dangerous Goods Form (Transport Document) would accord with the principles of Agenda 21 Chapter 19 and could contribute to improving standards for the completion of transport documentation.

UN ECE Working Party on Facilitation of International Trade Procedures

A harmonised Dangerous Goods Form should be acceptable in all modal regulations or conventions. An example of such a form is illustrated in 5.4.4 of the Model Regulations on the Transport of Dangerous Goods (MRTDG), which also makes reference in footnote 1 to 5.4.1.3.2 to the recommendations of the UN ECE Working Party on Facilitation of International Trade Procedures, including Recommendation No. 11, Documentary Aspects of the International Transport of Dangerous Goods. The following statement from this is relevant:

> 'The Working Party on Facilitation of International Trade Procedures, at its forty-ninth session in September 1995, agreed to recommend to Governments and international organisations involved in the transport of dangerous goods that action should be taken to harmonise information requirements .....'

Reference is also made that the transmission of dangerous goods information by electronic data interchange (EDI) should not be precluded and that any legal barriers should be removed.

Issues for resolution

Before harmonisation of modal regulations and a globally harmonised Dangerous Goods Form could be adopted, there are a number of points that need to be considered or reconsidered;-

- For whose prime use and for what purpose is the Dangerous Goods Form intended. This should determine the information required.

- The nature and detail of information required, and whether the model regulations should detail this comprehensively, as in the IMDG Code, with individual modal regulations stipulating separately any additional requirements.

- The content and sequence of information on the Dangerous Goods Form as variations in the information (data element) requirements occur between some modal regulations;-

  - In 5.4.1.2 of the MRTDG, the International Civil Aviation Organization Technical Instructions (ICAO TI's) and the IMDG Code, the sequence of information required is Proper Shipping Name, Class/Division, UN Number, Packing Group (if applicable) et alia as required; whereas in Europe, under the ADR and RID Regulations, the sequence is the Description of the Goods (UN number and then Proper Shipping Name), Class, Item number, Letter (Packing Group) and the initials ADR or RID.

Electronic Data Interchange (EDI) and related information technologies

Regulatory problems currently exist concerning the full or partial use of Electronic Data Interchange (EDI) and related information technologies within the transport operation.

- EDI (paperless trading): The MRTDG in the introductory note to Chapter 5.4 recognises the use of electronic data interchange (EDI) transmission techniques as an *aid* but not as an *alternative* to paper documentation. In some modal regulations, e.g. road transport, paper copies of the Dangerous Goods Form will still currently be needed to accompany the dangerous goods in order to facilitate regulatory enforcement or other checks during the transport operation, but this should not preclude the development and/or use of alternative EDI based technologies. Currently, EDI networks are in place and are being used in some modes of transport for the movement of dangerous goods. One of the obstacles to its more widespread use, either in full or in part, is the requirement for written signatures.

- Many manufacturers of dangerous goods now use specialist third party warehousing and distribution facilities. Dangerous goods are properly classified, packaged, marked and labelled by the manufacturer and orders are subsequently assembled at a remote warehousing/distribution facility. The manufacturer generates the Dangerous Goods Form by EDI and it is printed at the warehousing/distribution facility. As the manufacturers have no employees at that location, they are unable to sign the shippers declaration of conformity, and time constraints preclude it being posted for signature.

Many companies are having to introduce new computer software because of the approaching millennium. The adoption of an internationally accepted and recognised Dangerous Goods Form, might still enable those companies operating multinationally to adopt a single IT solution to dangerous goods transport documentation across all their operations.

Proposal

CEPE requests the Sub-Committee to agree on the following principles for amending the content of Chapter 5.4 of the Model Regulations on the Transport of Dangerous Goods. It is recognised that agreement on the actual content will require more detailed discussions, for which the Sub-Committee is invited to decide on the nature and format. CEPE has prepared a draft text from the modal regulations as a starting point for such discussions (See Annex 2).

I. To adopt a globally harmonised Dangerous Goods form as an internationally recognised and accepted standard. This document should be incorporated into all international modal regulations, but it is not intended that its use should be mandatory.

II. Chapter 5.4 should contain a comprehensive text that could be adopted, as written, by all modal regulations. Each modal regulation should incorporate any modal specific provisions as paragraphs within each section. This text should specify clearly the detail, nature and content of hazard information requirement in order to improve documentation standards.

III. The use of EDI and related communication technologies should be permitted, and the model regulations should reference the internationally acceptable standards. The need for written signatures should be replaced by one for "authentication on behalf of the company"

Justification

CEPE considers that the adoption of harmonised regulations and an internationally recognised standard for a Dangerous Goods Form, would be beneficial for the following reasons:-

- It would enable the medium and large size companies who operate internationally to adopt a single IT solution for the production of the Dangerous Goods Form in all countries. These companies probably account for the majority of Dangerous Goods movements, and many of them need to alter existing computer systems because of the impending new millennium.

- Simplification, through harmonisation, should lead to greater accuracy and an improvement in the standard of provision of hazard information, with consequential benefits in safety.

- It would facilitate multimodal transport and also facilitate regulatory enforcement checks on the transport of dangerous goods when a standardised Dangerous Goods Form is used.

- It would accord with the aims and principles of Agenda 21 Chapter 19 of the UNCED, and would facilitate international trade by removing barriers to trade.

- Provision for the use of EDI and related communication technologies and the replacement of the requirement for written signatures by a requirement for "authentication on behalf of the company", would remove practical problems for industry.

* * * * *

Annex 1

DRAFT CHAPTER 5.4

In the draft text the following conventions have been used:

Struck through text	is existing text in the model regulations that has been deleted or replaced
Bold text	is text from other modal regulations or proposed new text
[] Square Brackets	is provisional new text for further discussion
{} Brackets	indicates the source of text copied or adapted from modal regulations

The following section and paragraph headings are used:

5.4.1 General provisions and procedures

5.4.2 Dangerous Goods Transport Documentation information

5.4.2.1 General information

5.4.2.2 Class specific information

5.4.2.3 Case specific information

5.4.3 Certificates and Declarations

5.4.4 Emergency Response information

5.4.5 Additional Handling information

5.4.6 Exemptions from Documentation

Some paragraph headings have been provided without any text, in order to make provision for additional provisions or mode specific information.

Extra paragraphs can be incorporated in each section to accommodate modal additions to the standard text in the model regulations, e.g.:

5.4.2.4 Modal specific information

NOTE: References made to the IATA Dangerous Goods Regulations arise from their having a prescribed Dangerous Goods Form.

Annex 2

CHAPTER 5.4

DOCUMENTATION

5.4.1 General Provisions and Procedures

5.4.1.1 **Except as otherwise specified in these regulations, a dangerous goods transport document shall be completed for each consignment of dangerous goods. This may be a paper document or an electronic data interchange (EDI) message (see Note to 5.4.1.4.1), and shall be communicated to the transport operator by the consignor, or by any person acting on his behalf. {IATA DGR 8.0.1 and ADR 5.4.1.(a) (1)}**

5.4.1.2 **One of the primary requirements of the dangerous goods transport document is to convey the fundamental information relative to the hazards of the goods. It is, therefore, necessary to include certain basic relative information on the document for a consignment of the dangerous goods. When dangerous goods are offered for shipment, similar documents to those for other categories of goods have to be prepared. The form of these documents, the particulars to be entered on them and the obligations they entail may be fixed by international conventions applying to certain modes of transport and by national legislation**. It is not the intention of these regulations to require a separate document for dangerous goods when a consignment contains both dangerous and non-dangerous goods, or to restrict the number of individual dangerous goods descriptions that may appear on a single document. **{IMDG GI 9.1} {IMDG GI 9.2}**

5.4.1.3 **Multiple loads and consolidated consignments**

(i) **If by reason of the size of the load a consignment cannot be loaded in its entirety on a single transport unit, at least as many separate (sets of) documents, or copies/sets of the single document or electronic message (EDI) shall be made out as transport units loaded. Furthermore, in all cases separate transport documents or electronic messages shall be made out for consignments or parts of consignments which may not be loaded together on the same transport unit by reason of any prohibitions on mixed loading. The term transport unit does not include overpacks. {ADR 2002 (3)}**

(ii) **In the case of multiple consignments loaded on to a single transport unit, a separate (set of) transport document shall be completed for each consignment.**

5.4.1.4 Format of the transport document

5.4.1.4.1 ~~When an existing transport or cargo handling document cannot be used for the purposes of dangerous goods documentation for multi-modal transport, the use of documents of the form shown in 5.4.4 is considered advisable.~~
The multi-modal dangerous goods form and continuation sheet shown in this chapter may be used for the international transport of dangerous goods under all modal regulations. The use of this Dangerous Goods Form is not mandatory, but it will be accepted and recognised as fulfilling such requirements. It is not intended that it should be used for national transport, but that it may be used for such purposes at the discretion of the consignor or the national competent authority 1/.

1/ If used **Further information on documentation is contained** in the relevant recommendations of the UN/ECE Working Party on Facilitation of International Trade Procedures **which** may be consulted, in particular Recommendation No. 1 (United Nations Lay-out Key for Trade Documents) (ECE/TRADE/137, edition 81.11), Recommendation No. 11 (Documentary Aspects of the International Transport of Dangerous Goods) (ECE/TRADE/204, edition 96.1) and Recommendation No. 22 (Lay-out Key for standard Consignment Instructions) (ECE/TRADE/168). Refer to the Trade Data Elements Directory, Volume III, Trade Facilitation Recommendations (ECE/TRADE/200) (United Nations publication Sales No. E.96.II.E.13).

~~Note: Reference to documents in these Regulations does not preclude the use of electronic data processing (EDP) and electronic data interchange (EDI) transmission techniques as an aid to paper documentation.~~

If the dangerous goods transport document does not contain sufficient space to accommodate all the required entries and information, additional pages in the form of a continuation sheet may be used. In such a case, each page of the documentation must show the page number and the total number of pages. {IATA DGR 8.1.2.5}

Note: Reference to transport documents in these Regulations includes the use of electronic data interchange (EDI) and related information technologies as an alternative to paper documentation under permissible circumstances.

5.4.1.4.2 **[The paper size should be the international ISO size A4 (210 x 297 mm, 81/3 x 112/3 in.). In some countries, particularly North America, the paper size 216 x 280 mm (8½ x 11 in.)is commonly used. Where this size is used, alignment of the form can be achieved by maintaining the same top and left-hand margins, which places the layout in the same relative position vis-a-vis the top and left-hand paper edges; the resulting common image area measures 183 x 262 mm.] {UN/ECE Working Party on Facilitation of International Trade Procedures, Recommendation No. 1}**

[The paper shall have diagonal hatchings printed vertically in the right hand margin.] {IATA DGR 8.1.1.2 (part)}

[Dangerous goods form of existing 5.4.4 to be reproduced here]

5.4.1.5 The information required on a **paper** transport document shall be legible.

5.4.1.6 The text of the declaration(s) required by 5.4.3.1, and the information relative to the hazards of the goods to be transported (as indicated in 5.4.2) may be incorporated in, or combined with, an existing transport or cargo handling document. The layout of the information in the document or the order of transmission of the corresponding data by electronic data interchange (EDI) and related information technologies shall be as provided in 5.4.1.7 and 5.4.2.1.

5.4.1.7 Sequence of information required in document

5.4.1.7.1 If both dangerous and non-dangerous goods are listed in one document, the dangerous goods shall be listed first, or otherwise emphasised.

5.4.1.7.2 The location and order in which the elements of information required in 5.4.2.1 appear in the transport document is left optional, except that the proper shipping name, class, UN Number and, where assigned, packing group shall appear in that sequence. An example of a dangerous goods description is:

"ALLYL ALCOHOL, 6.1, UN1098, I"

5.4.1.8 **[Languages]**

[In addition to the languages which may be required by the State of Origin, English should be used for the Dangerous Goods Transport Document] {ICAO TI's Part 4; 4.1.13};

5.4.1.9 Number of copies of the transport document

[to be specified]

5.4.2 Dangerous goods transport document information

5.4.2.1 General Information required in the document

~~Note: In addition to the provisions of this section, other elements of information may be required by the competent authority or for certain modes of transport (e.g. flash point or flash point range in °C c.c.).~~

The dangerous goods transport document shall contain the following information for each dangerous substance, material or article offered for transport by any mode:

.1 The proper shipping name, as determined in accordance with 3.1.2, **supplemented with the technical name(s) if appropriate (see 3.1.2.6.1 and Column 9 of the Dangerous Goods List) {ADR 5.4.2.(2)};**

.2 The class, or, when assigned, the division of the goods, ~~which for substances and articles of Class 1 shall be followed immediately by the compatibility group letter~~. **[For "Dangerous goods in machinery or apparatus", the class or division of each of the dangerous goods contained therein.] { ICAO TI's Part 4; 4.1.2 };**

.3 The UN Number preceded by the letters "UN" and, ~~where assigned, the packing group for the substance or article; and~~ **[Not required for consignments identified by the proper shipping name 'Dangerous Goods in limited quantities of class/classes...'.];{IMDG GI 9.3.3}**

.4 **The packing group for the substance or article where assigned;**

.5 **[Subsidiary hazards not communicated in the proper shipping name] {IMDG GI 9.3.10}**

.6 ~~The total quantity of dangerous goods covered by the description (by volume, mass or net explosive content, as appropriate).~~ **The number, [design capacity]/[actual content] and description of the packagings.**

(i) **For single packagings for liquids conforming to the requirements of Chapter 6.1, the description of the packagings shall consist of the relevant code for the packaging (see 6.1.2.7, column "Code") preceded by the characters "UN/", e.g. UN/1A1, or the description of the packaging (see 6.1.2.7, columns "Kind", "Material", "Category"), e.g. Drums, Steel, non-removable head.**

(ii) **For single packagings for solids conforming to the requirements of Chapter 6.1, the description of the packagings shall consist of the relevant code for the packaging (see 6.1.2.7, column "Code") preceded by the characters "UN/", e.g. UN/1A2, or the description of the packaging (see 6.1.2.7, columns "Kind", "Material", "Category"), e.g. Drums, Steel, removable head.**

(iii) **For combination packagings for solids or liquids conforming to the requirements of Chapter 6.1, the description of the packagings shall consist of the relevant code for the packaging (see 6.1.2.7, column "Code") preceded by the characters "UN/", e.g. UN/4G, or the description of the packaging (see 6.1.2.7, columns "Kind", "Material", "Category"), e.g. Boxes, Fibreboard.**

(iv) **For composite packagings for solids or liquids conforming to the requirements of Chapter 6.1, the description of the packagings shall consist of the relevant code for the packaging (see 6.1.2.7, column "Code") preceded by the characters "UN/", e.g. UN/6HG2, or the description of the packaging (see 6.1.2.7, columns "Material", "Category"), e.g. Plastics receptacle(s) in fibreboard box.**

(v) **For Intermediate Bulk Containers (IBC's) conforming to the requirements of Chapter 6.5, the description of the packagings shall consist of the relevant code for the packaging (see 6.5.1.4.3, column "Code") preceded by the letters "UN/", e.g. UN/31A, or the description of the packaging (see 6.5.1.4.3, columns "Material", "Category") preceded by the letters "IBC", e.g. IBC, Steel, for liquids.**

(vi) For Receptacles for gases conforming to the requirements of Chapter 6.2, the description of the packagings shall be as follows:

- Gas Cylinders; [to be specified]

- [Aerosols and small receptacles for gas:] [to be specified]

(vii) Limited quantities.

- The description of the package shall be either the term "Shrink -wrapped trays" or " stretch wrapped trays" or the equivalent description of the packaging determined in accordance with 5.4.2.1.6 (iii);

7 The total quantity of dangerous goods covered by the description [For "Dangerous goods in machinery or apparatus", the individual total quantities of dangerous goods in solid, liquid or gaseous state contained in the article.] [ICAO TI's Part 4; 4.1.3(a)(3)]:

(i) by volume [for liquids] or

(ii) by mass [for solids or articles]

8 [Number of Packing Instruction] [ICAO TI's Part 4; 4.1.3(d)];

5.4.2.2 Additional Class Specific transport document provisions:

1 Class 1:

(i) The class (see 5.4.2.1.2) shall be followed immediately by the compatibility group letter.

(ii) The total quantity of dangerous goods, (see 5.4.2.1.7), should be by the net explosive(s) mass of the contents.

(iii) Consignments of goods, other than Division 1.4, shall be accompanied by a declaration, which may appear on the transport document, certifying that the freight container, vehicle or wagon is structurally serviceable as defined in 7.1.3.2.1 (b).

(iv) [Entries have been included for 'SUBSTANCES, EXPLOSIVE, N.O.S.', 'ARTICLES, EXPLOSIVE, N.O.S.' AND 'COMPONENTS, EXPLOSIVE TRAIN, N.O.S.'. When a specific entry does not exist, the competent authority of the country of origin should use the entry appropriate to the hazard division and compatibility group. The transport document should contain the statement: "Transport under this entry approved by the competent authority of ...." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.] [IMDG Class 1 Intro. 2.3]

(v) **[The transport of explosive substances for which a minimum water or phlegmatizer content is specified in the individual entry is prohibited when containing less water or phlegmatizer than the specified minimum. Such substances should only be transported with special authorization granted by the country of origin. The transport document should contain the statement: "Transport under this entry approved by the competent authority of ...." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.] [IMDG Class 1 Intro. 2.4]**

(vi) **[When explosive substances or articles are packaged "as approved by the competent authority", the transport document should contain the statement: "Packaging approved by the competent authority of ...." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.] [IMDG Class 1 Intro. 2.5]**

(vii) **[There are some hazards which are not indicated by the hazard division and compatibility group of a substance. The shipper should provide an indication of any such hazards on the transport document.] [IMDG Class 1 Intro. 2.7]**

2 Class 2:

(i) **The class (see 5.4.2.1.2) for gases possessing subsidiary hazards, should be further amplified to indicate these hazards by adding the words "flammable", "oxidizing agent" and/or "corrosive", as appropriate. {IMDG GI 9.3.2}**

3 Class 3:

4.1 Class 4.1:

(i) For self-reactive substances ~~of Division 4.1~~ that require temperature control during transport, the ~~control and emergency temperatures shall be indicated in the~~ transport document **should contain the statement: "Control temperature .....°C" "Emergency temperature .....°C".**

(ii) When for certain self-reactive substances and related substances ~~of Division 4.1~~ the competent authority has permitted the "EXPLOSIVE" subsidiary risk label (model No. 01) to be dispensed with for a specific package, ~~a statement to this effect shall be included in~~ the transport document **should contain the statement: "Transport without an "Explosive" label approved by the competent authority of ....." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.**

(iii) When self-reactive substances are transported under conditions where approval is required (~~for self-reactive substances~~ see 2.4.2.3.2.5 and 4.1.5.2.2), ~~a statement to this effect shall be included in the transport document~~ the transport document **should contain the statement: "Transport under this entry approved by the competent authority of ....." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.**

(iv) When **[new]** self-reactive substances are transported under conditions where approval is required (see 2.4.2.3.2.5 and 4.1.5.2.2), a copy of the statement of approval of the classification and conditions of transport for non-listed self-reactive substances shall be attached to the transport document **which should contain the statement: "Transport under this entry approved by the competent authority of ....." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.**

(v) When a sample of a self-reactive substance (see 2.4.2.3.2.5(b)) is transported, a ~~statement to this effect shall be included in the transport document~~ **the proper shipping name shall be preceded by the word "SAMPLE".**

4.2 Class 4.2:

4.3 Class 4.3:

5.1 Class 5.1:

5.2 Class 5.2:

(i) For ~~organic peroxides~~ **substances** that require temperature control during transport, the ~~control and emergency temperatures shall be indicated in the~~ transport document **should contain the statement: "Control temperature .....°C" "Emergency temperature .....°C.**

(ii) When ~~for organic peroxides of Division 5.2~~ the competent authority has permitted the "EXPLOSIVE" subsidiary risk label (model No. 01) to be dispensed with for the specific package, ~~a statement to this effect shall be included in~~ the transport document **should contain the statement: "Transport without an "Explosive" label approved by the competent authority of ....." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.]**

(iii) When ~~organic peroxides~~ **substances** are transported under conditions where approval is required (~~for organic peroxides~~ see 2.5.3.2.5, 4.1.5.2.2, 4.2.1.13.1 and 4.2.1.13.3), ~~a statement to this effect shall be included in~~ the transport document **should contain the statement: "Transport under this entry approved by the competent authority of ....." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.]**

(iv) When **[new]** ~~organic peroxides~~ **substances** are transported under conditions where approval is required (see 2.5.3.2.5, 4.1.5.2.2, 4.2.1.13.1 and 4.2.1.13.3), a copy of the statement of approval of the classification and conditions of transport for non-listed ~~organic peroxides~~ **substances shall be attached to the transport document which should contain the statement: "Transport under this entry approved by the competent authority of ....." followed by the State's distinguishing sign for motor vehicles in international traffic of the country for which the authority acts.]**

(v) When a sample ~~of an organic peroxide~~ (see 2.5.3.2.5.1) is transported, ~~a statement to this effect shall be included~~ **the proper shipping name shall be preceded by the word "SAMPLE".**

6.1 Class 6.1:

6.2 Class 6.2:

(i) The full address of the consignee shall be shown on the document, together with the name of a responsible person and their telephone number.

(ii) The transport documents shall show the number of the flight or train, its date and the name(s) of the airport(s) or station(s) of trans-shipment.

(iii) If the substance is perishable, appropriate warnings shall appear on the transport document, for instance: "Keep cool, between +2°C and +4°C" or "Keep frozen" or "Do not freeze".

7 Class 7:

(i) Additional information is required for the carriage of radioactive material; refer to the Regulations for the Safe Transport of Radioactive Material (1996) edition, IAEA Safety Standards Series No. ST-1, para. 549.

(ii) **The class (see 5.4.2.1.2) for radioactive materials, should be followed immediately by the words "RADIOACTIVE MATERIAL", unless it already appears in the proper shipping name. {IMDG GI 9.3.2} {ICAO TI's Part 4; 4.1.9(a)}**

(iii) Special documentation and prior notification may be required for the carriage of radioactive material; refer to the Regulations for the Safe Transport of Radioactive Material (1996) edition, IAEA Safety Standards Series No. ST-1, paras. 555-561 and 801-834.

8 Class 8:

9 Class 9:

5.4.2.3 Additional Case Specific transport document provisions

1 Flammable goods

[Minimum flash point if 61°C or below (in °C closed cup(c.c.)).] {IMDG GI 9.3.9}

2 Wastes:

If waste dangerous goods (other than radioactive wastes) are being transported for disposal, or for processing for disposal, the proper shipping name (see 5.4.2.1.1) shall be preceded by the word "WASTE".

3 Elevated temperature materials:

If the proper shipping name of a substance that is transported or offered for transport in a liquid state at a temperature equal to or exceeding 100°C, or in a solid state at a temperature equal to or exceeding 240°C, does not convey the elevated temperature condition (for example, by using the term "MOLTEN" or "ELEVATED TEMPERATURE" as part of the proper shipping name), the word "HOT" shall immediately precede the proper shipping name on the transport document.

4 Limited quantities

(i) When dangerous goods are transported according to the exceptions for dangerous goods packed in limited quantities provided for in Column 7 of the Dangerous Goods List and Chapter 3.4, the words "limited quantity" or "LTD QTY" shall be included **in after** the ~~description of the consignment~~ **proper shipping name; or**

(ii) **[The proper shipping name 'Dangerous Goods in limited quantities of class/ classes....' may be used where a consignment consists of Dangerous Goods of more than one description consigned under the limited quantity provisions of Column 7 of the Dangerous Goods List and Chapter 3.4.] {IMDG GI 18.7.1.2.2}**

.5 Salvage packagings:

When dangerous goods are transported in a salvage packaging, the words, "SALVAGE ~~PACKAGE~~" shall be added after the description of the ~~goods~~ **packaging** in the dangerous goods transport document.

.6 Empty uncleaned packagings and tanks

Empty means of containment (including packagings, IBC's, portable tanks, road transport tanks and railway transport tanks) which contain the residue of dangerous goods of other than Class 7 shall be described as such by, ~~for example~~, placing the words, "EMPTY UNCLEANED" or "RESIDUE LAST CONTAINED" before ~~or after~~ the proper shipping name.

5.4.2.4 Additional Modal Specific transport document provisions

5.4.3 Certificates and Declarations

5.4.3.1 Shippers certificate/declaration of compliance

The dangerous goods transport document prepared by the shipper shall in addition carry, or be accompanied by, **an authenticated** certificate or declaration that the consignment offered can be accepted for transport and that the goods are properly packaged, marked and labelled, and in proper condition for transport in accordance with the applicable regulations (refer also to the Regulations for the Safe Transport of Radioactive Material (1996) edition, IAEA Safety Standards Series No. ST-1, paras. 552 and 553 for Class 7). The form for this declaration is:

"I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled[/~~placarded~~], and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Authenticated by the shipper"

5.4.3.2 Container/**vehicle** packing certificate/declaration

When dangerous goods are loaded into **a unit**, e.g. freight container2/, **flat, trailer or other vehicle intended for carriage**, those responsible for supervising this operation3/ shall provide a "container packing certificate" or "**vehicle declaration**" certifying that the operation has been carried out in accordance with the following conditions, and identifying the person signing the certificate. **The container/vehicle/unit identification number(s) should also be indicated: {IMDG Gl 9.8 & 12.3.7}**

2/ For the purposes of these provisions the term "freight container" is limited to transport units meeting the definition of "container" in the International Convention for Safe Containers (CSC) signed at Geneva on 2 December 1972. The term does not include a "portable tank" as defined in 1.2.1 or a freight container being used to transport radioactive material and which complies with the IAEA requirements for freight containers.

3/ Guidelines for use in practice and in training for loading goods in freight containers or vehicles have been drawn up by the International Maritime Organisation (IMO) and the International Labour Organisation (ILO) and have been published by the IMO (IMO/ILO Guidelines for Packing Cargo in Freight Containers or Vehicles).

(a) The container is clean, dry and apparently fit to receive the goods;

(b) Packages which shall be segregated, i.e. in different freight containers, have not been loaded in the container;

(c) All packages have been externally inspected for damage, and only sound packages loaded;

(d) All goods have been properly loaded and, where necessary, adequately braced with securing material to suit the mode(s) of transport for the intended journey;

(e) Goods loaded in bulk have been evenly distributed within the container;

(f) For consignments including goods of Class 1 other than Division 1.4, the container is structurally serviceable in accordance with 7.1.3.2.1;

(g) The container and packages are properly marked, labelled and placarded in accordance with this Part; and

(h) A certificate or declaration, as indicated in 5.4.3.1, has been received for each dangerous goods consignment loaded in the container.

5.4.3.3 The functions of the document required in 5.4.2 **(see also 5.4.3.1)** and of the container packing certificate/**vehicle certificate** required in 5.4.3.2 may be incorporated in a single document. If these functions are incorporated into a single document, the inclusion of **an signed authenticated** declaration that the packing of the container has been carried out in accordance with the applicable modal regulations together with the identification of the **responsible** person ~~signing the declaration~~ will suffice. If these functions are not incorporated into a single document, the relevant documents shall be attached one to the other.

5.4.4 Emergency Response Information

For consignments for which a dangerous goods transport document is required by these regulations, appropriate information shall be immediately available at all times for use in emergency response to accidents and incidents involving dangerous goods in transport. The information shall be available away from the |~~packages containing the~~| dangerous goods and immediately accessible in the event of an accident or incident.

Methods of compliance include:

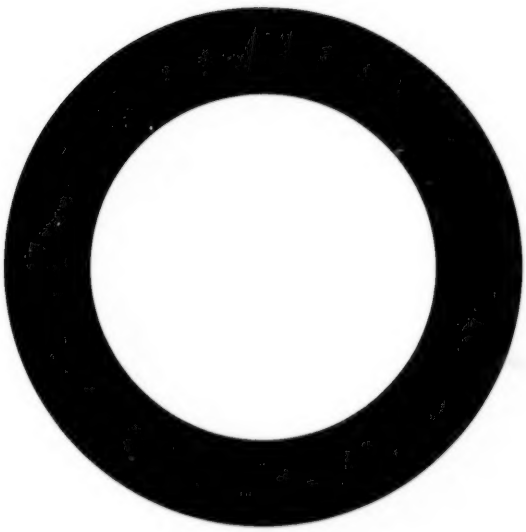
(a) Appropriate entries in the transport document; or

(b) Provision of separate document such as a safety data sheet; or

(c) Provision of separate document, such as the ICAO "Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods" or the IMO "Emergency Procedures for Ships carrying Dangerous Goods" and "Medical First Aid Guide in Accidents Involving Dangerous Goods", for use in conjunction with the transport document.

5.4.5 Additional handling Information

5.4.6 Exemptions from Documentation



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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the Transport of Dangerous Goods
(Fourteenth session, Geneva, 8-18 December 1997, agenda item 4 (b))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Physical hazards

Joint ILO/UN CETDG Working Group on harmonized classification criteria for flammability and reactivity

Transmitted by the European Confederation of Paint, Printing Ink and Artists' Colours Manufacturers' Association (CEPE)

Definition and criteria for flammable liquids

Introduction

In English the definition of the word 'flammable' is ***readily combustible.***

In the report on the work of the joint ILO/UN working groups on harmonized classification criteria for flammability and reactivity contained in ST/SG/AC.10/23/Add.4, the criteria for the classification of flammable liquids refers only to flash point and boiling point.

Part III, sub-section 32.5.2, of the Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria contains the following:

"32.5.2 ***Test L.2: Sustained combustibility test***

32.5.1 *Introduction*

This test is used to determine if a substance sustains combustion when heated under the test conditions and exposed to a flame."

The proposed criteria for harmonisation, which are based solely on criteria relating to flash point and boiling point, are only indicative of the potential to meet the definition of having the intrinsic properties of being flammable. The combustibility test 'L.2' needs to be included in order to properly determine the intrinsic property (hazard) of being flammable.

Proposal

Test L.2: Sustained combustibility test, as contained in Part III, sub-section 32.5.2, of the Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria should be included in the harmonised criteria for flammable liquids.

Justification

The property of being ***readily combustible (flammable)*** is an intrinsic property of hazard and not a property associated with risk, and is therefore a prerequisite in the definition of being flammable.

There are many products, including domestic washing-up liquids, which , when tested by the present proposal for criteria, will exhibit a flash-point but which do not have the property of being readily combustible (flammable).